

SUMMARY STATEMENT

State v. Orozco
Docket No. 47263

The State charged fifteen-year-old Lucas Orozco with robbery and burglary, both felonies, for allegedly robbing a Caldwell convenience store. After a magistrate court made a probable cause determination, it waived juvenile jurisdiction and bound Orozco over to district court as an adult pursuant to Idaho Code section 20-509. Idaho Code section 20-509, which is sometimes referred to as an “automatic waiver,” mandates that a juvenile accused of committing one of the enumerated offenses, in this case robbery, “shall be charged, arrested and proceeded against by complaint, indictment or information as an adult.” I.C. § 20-509(1). Orozco challenged the constitutionality of section 20-509. The district court denied the motion, relying on precedent from the Idaho Court of Appeals, which has previously upheld the statute. Orozco appealed, arguing that the automatic waiver denied him procedural due process protections afforded to him by the U.S. Constitution.

In a 4-1 decision, the Supreme Court affirmed the decision of the district court, upholding the constitutionality of Idaho Code section 20-509 and the so-called “automatic waiver.” The Court held that Orozco did not have a liberty interest in being charged as a juvenile or being placed in the juvenile court system; therefore, without a deprivation of a liberty interest, the Fourteenth Amendment’s procedural due process protections were not implicated.

This summary constitutes no part of the opinion of the Court, but has been prepared by court staff for the convenience of the public.